CONSTANTINE A. DESPOTAKIS, ESQ. (CD 4944)
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Attorneys for Defendant, Bank of America, N.A.

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

DETAIL OF AVEL CERVICES DIS

RETAIL TRAVEL SERVICES, INC.,

07 CV 4617 (CM)

Plaintiff,

-against-

ANSWER TO CROSSCLAIMS OF BRINKS DEFENDANTS

BANK OF AMERICA, N.A., BRINKS GLOBAL SERVICES USA, INC. AND BRINKS, INC.,

Defendants.
 X

Defendant, Bank of America, N.A. hereinafter "BOA", by its attorneys, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, in answer to the crossclaims of defendants Brinks Global Services, USA, Inc. and Brinks, Incorporated, sued herein incorrectly as Brinks, Inc., (hereinafter "Brinks Defendants") alleges and answers as follows:

- 1. Denies the allegations contained in paragraph 64 of the Brinks Defendants' crossclaim for contribution as against BOA and BOA further again incorporates by reference as though fully set forth herein all of BOA's Affirmative Defenses to plaintiff's complaint and Crossclaims against the Brinks Defendants, all as set forth in BOA's answer filed in the within action.
- 2. Denies the allegations contained in paragraph 65 of the Brinks Defendants' crossclaim for indemnification as against BOA and BOA further again incorporates by reference as though fully set forth herein all of BOA's Affirmative Defenses to plaintiff's complaint and

WHEREFORE, BOA respectfully requests an Order of the Court dismissing the crossclaims of the Brinks Defendants as against BOA, together with such other and further relief as to this Court may seem just and proper.

Dated: White Plains, New York October 5, 2007

Yours etc,

WILSON, ELSER, MOSKOWITZ

EDELMAN & DICKER LLP

By_

Constantine A. Despotakis, Esq. (CD 4944)

Attorneys for Defendant BANK OF AMERICA, N.A.

3 Gannett Drive

White Plains, New York 10604

Tel. (914) 323-7000

Our File No. 02503.00311

To: Christopher Schierloh, Esq.
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New York, NY 10017

Jonathan S. Chernow, Esq.
WHITE FLEISCHNER & FINO, LLP
Attorneys for Defendants
Brink's Global Services U.S.A., Inc.,
and Brink's Incorporated
s/h/i as Brinks, Inc.
140 Broadway, 36th Floor
New York, New York 10005
(212) 487-9700

AFFIDAVIT OF SERVICE

STATE OF NEW YORK		
)	SS.
COUNTY OF WESTCHESTER)	

I, Melinda Rodriguez, being sworn, say:

I am not a party to the action, am over the age of 18 years of age and reside in Bronx County, New York. On October 5, 2007, I served the within ANSWER TO CROSSCLAIMS OF BRINKS DEFENDANTS by depositing a true copy thereof enclosed in a postpaid wrapper, via First Class Mail and/or International Air Mail as the case may be, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

Christopher Schierloh, Esq. CASEY & BARNETT, LLC Attorneys for Plaintiff, 317 Madison Avenue, 21st Floor New York, NY 10017 (212) 286-0225

Jonathan S. Chernow, Esq.
WHITE FLEISCHNER & FINO, LLP
Attorneys for Defendants
Brink's Global Services U.S.A., Inc.,
and Brink's Incorporated
s/h/i as Brinks, Inc.
140 Broadway, 36th Floor
New York, New York 10005
(212) 487-9700

Sworn to before me this 5th day of October 2007

Notary Public

EMILIA P. BINGAY
Notary Public, State of New York
No. 60-4749786

The Westernester County

Qualified in Westchester County Commission Expires October 31, 2009 Melinda Radrioue